



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

April 11, 2025

**BY ECF**

Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Zekaj v. Noem, et al.*, No. 25 Civ. 1362 (RA)

Dear Judge Abrams:

This Office represents Defendants in the above-referenced case. On behalf of the parties, we respectfully request a one-month adjournment of the initial pretrial conference (and a corresponding extension of all corresponding deadlines for pre-conference submissions to the Court), currently scheduled for April 18, 2025. We also respectfully request a corresponding one-month extension, from May 2, 2025, to June 2, 2025, of the deadline for Defendants to answer or otherwise respond to Plaintiff's complaint.

We make these requests because this Office is presently working with U.S. Citizenship and Immigration Services ("USCIS") to determine whether USCIS may take action that may moot Plaintiff's claims. Plaintiff joins these requests. This is the parties' first request for an adjournment of this conference and extension of the deadline to respond to the complaint. We thank the Court for its consideration of these requests.

Respectfully,

MATTHEW PODOLSKY  
Acting United States Attorney for the  
Southern District of New York

By: /s/ Charles S. Jacob  
CHARLES S. JACOB  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, NY 10007  
Telephone: (212) 637-2725  
Email: charles.jacob@usdoj.gov

Application granted. The initial conference is adjourned to May 30, 2025 at 1:00 p.m. The parties shall file their joint letter and case management materials no later than May 23, 2025.

SO ORDERED.

Hon. Ronnie Abrams  
April 14, 2025